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20			
21	I FIGA WHITTIM ANGOLE	C N 221 01777 IAD EN	
22	LEISA WHITTUM, and NICOLE KILBURN,	Case No. 2:21-cv-01777-JAD-EJY	
23	Plaintiffs,	STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO FILE REPLY IN SUPPORT OF MOTION TO REMAND	
24	v.	TELEST DEOLIESTI	
25	UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA,	[FIRST REQUEST]	
26	Defendant.		
27			
28			

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Plaintiffs Leisa Whittum and Nicole Kilburn ("Plaintiffs"), by and through their counsel of record, and Defendant University Medical Center of Southern Nevada ("UMC") have agreed and stipulated to the following:

- 1. On September 24, 2021, Defendant UMC filed a Petition for Removal [ECF No. 1].
- On October 29, 2021, Plaintiff Whittum filed a Motion to Remand this matter to 2. the Eighth Judicial District Court [ECF No. 14] ("Motion").¹
- 3. On November 12, 2021, the Court granted the parties' stipulation to extend UMC's response deadline to the Motion to November 19, 2021 [ECF No. 27].
- 4. On November 19, 2021, UMC filed its response to the Motion [ECF No. 31] ("Response").
- 5. Plaintiffs' deadline to file a reply in support of the Motion is presently November 26, 2021.

Plaintiffs and UMC have agreed to extend Plaintiffs' deadline to file a reply in support of the Motion one business day, until November 29, 2021. This extension will permit Plaintiffs additional necessary time to consider the authorities and arguments UMC raises in its Response.

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¹ On October 29, 2021, after filing the Motion, Plaintiffs filed a First Amended Complaint,

adding Plaintiff Kilburn [ECF No. 15]. Plaintiff contends that her inclusion does not alter the bases for remand.

This stipulation is made in good faith, is not interposed for delay, and is not filed for an

1 improper purpose. 2 3 IT IS SO STIPULATED. Dated November 26, 2021 4 KNEPPER & CLARK LLC KOELLER, NEBEKER, CARLSON & 5 HALUCK, LLP /s/ *Miles N. Clark* 6 /s/ Mark F. Roach Miles N. Clark, Esq. Nevada Bar No. 13848 Mark F. Roach, Esq. 7 5510 So. Fort Apache Rd, Suite 30 Nevada Bar No. 8237 8 Las Vegas, NV 89148 Andrew C. Green, Esq. Email: miles.clark@knepperclark.com Nevada Bar No. 9399 9 400 S. 4th Street, Suite 600 KRIEGER LAW GROUP, LLC Las Vegas, NV 89101 10 David H. Krieger, Esq. Email: Andrew.green@knchlaw.com Nevada Bar No. 9086 Email: Mark.Roach@knchlaw.com 11 2850 W. Horizon Ridge Parkway, Suite 200 12 Henderson, NV 89052 Counsel for Defendant University of Medical Center of Southern Email: dkrieger@kriegerlawgroup.com 13 Nevada John A. Yanchunis 14 (Pro Hac Vice to be submitted) Ryan D. Maxey 15 (Pro Hac Vice to be submitted) 16 MORGAN & MORGAN LITIGATION COMPLEX 17 GROUP 201 N. Franklin Street, 7th Floor 18 Tampa, Florida 33602 19 (813) 223-5505 iyanchunis@ForThePeople.com 20 rmaxey@ForThePeople.com 21 Counsel for Plaintiff 22 ORDER GRANTING STIPULATION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO 23 MOTION TO DISMISS FIRST AMENDED COMPLAINT AND FOR DEFENDANT TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS 24 IT IS SO ORDERED. 25 26 27 Dated: November 29, 2021

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